

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE



Jonathan Leite,
Plaintiff

v.

Matthew Goulet *et al.*,
Defendants

*
*
*
*
*
*
*

Civil No. 15-cv-00280-PB

DEFENDANT MATTHEW GOULET'S RESPONSES
TO FIRST SET OF INTERROGATORIES

Defendant Matthew Goulet hereby responds as follows to the first set of interrogatories propounded upon him in this matter by plaintiff Jonathan Leite.

1. Please fully describe your employment history since graduation from high school, identifying for each employer the name and address of the employer, your dates of employment with the employer, the title of each position that you held with the employer (stating the dates you held the position), the name and address and job title of each supervisor to whom you reported (stating the dates you reported to the supervisor), and your rates of pay for all dates of employment with the employer.

The defendant objects to this interrogatory as irrelevant and disproportional insofar as it requests information as to: the defendant's employment history prior to employment by the New Hampshire Department of Corrections; the address of any of the defendant's supervisors at any time; or the defendant's rate of pay at any time. Subject to and without waiver of these objections, the defendant states: in June 2004, I began working as a corrections officer for the New Hampshire Department of Corrections ("DOC") at the New Hampshire State Prison ("NHSP"). In April 2008, I was transferred to the Northern New Hampshire Correctional Facility. In 2012, I was promoted to corporal, then to sergeant. I have had many different supervisors during this time.

4. Did your employment responsibilities on August 24, 2012, include walking through "F Block" at NNHCF? If your answer is anything other than an unequivocal no, please state and/or identify the times during which you were scheduled to walk through "F Block" on August 24, 2012, the times during which you walked through "F Block" on August 24, 2012, and all documents relating to your scheduled and actual walk-throughs of "F Block" on August 24, 2012.

No.

5. Did your employment responsibilities on August 24, 2012, include monitoring "F Block" at the Northern New Hampshire Correctional Facility by video? If your answer is anything other than an unequivocal no, please state and/or identify the times during which you were scheduled to be monitoring "F Block" by video on August 24, 2012, the times during which you monitored "F Block" by video on August 24, 2012, and all documents relating to your scheduled and actual monitoring of "F Block" by video on August 24, 2012.

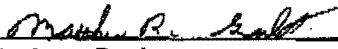
No.

6. Please identify the name, address, dates of employment at NNHCF, and job title for all dates of employment of each employee who bore responsibility to assign employees to walk through "F Block" and/or to monitor "F Block" by video on August 24, 2012, identifying the substance of the assignments that the employee made to NNHCF personnel to walk-through "F Block" and/or to monitor "F Block" by video on August 24, 2012, and all documents relating to and/or evidencing such assignments.

The defendant objects to this interrogatory as irrelevant and disproportional insofar as it requests the "job title for all dates of each employee who bore responsibility to assign employees" to the specified tasks on August 24, 2012. Subject to and without waiver of this objection, the defendant states: as the shift commander for first shift on August 24, 2012, I was responsible for assigning employees to all of their posts throughout the facility from 6 a.m. to 2 p.m. The second shift commander, Sgt. Smith, was responsible for assigning employees to all of their posts throughout the facility from 2 p.m. to 10 p.m. that day. I also refer to the document produced as DOC 000014.

I hereby declare under penalty of perjury that the foregoing is true and correct.

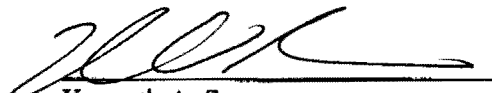
Executed on March 29, 2016 at NH/ACE Berlin, New Hampshire.


Matthew Goulet

As to objections:

JOSEPH A. FOSTER
ATTORNEY GENERAL

Date: March 31, 2016


Kenneth A. Sansone
N.H. Bar No. 18532
Assistant Attorney General
Civil Bureau
33 Capitol Street
Concord, NH 03301-6397
(603) 271-3650
kenneth.sansone@doj.nh.gov